

4. Defendant Sanford is a limited partnership formed in Illinois and its principal place of business is 2711 Washington Blvd, Bellwood, IL 60104. (Compl. ¶ 2).

5. Defendant Newell is a for profit corporation incorporated in Delaware and its principal place of business is Three Glenlake Parkway, Atlanta, GA, 30328. (Compl. ¶ 3).

6. Based on a fair reading of the Complaint, the amount in controversy in this action exceeds \$75,000. Plaintiff is seeking “compensatory damages, consequential damages, and incidental damages, including but not limited to emotional damages for future lost pay and lost benefits . . . in the amount of \$500,000.00” and punitive damages in the amount of \$1,500,000.00. (Compl. Prayer ¶ 2-3).

7. This Court has jurisdiction under the provisions of 28 U.S.C. § 1332 and this matter is one which may be removed to this Court, pursuant to the provisions of 28 U.S.C. § 1441, because complete diversity of citizenship exists between the parties and the amount in controversy exceeds the jurisdictional minimum.

8. Venue is proper pursuant to 28 U.S.C. § 1441(a) because this judicial district includes Bedford County, Tennessee.

9. Contemporaneously herewith, a true and correct copy of this Notice of Removal will be filed with the Circuit Court of Bedford County, Tennessee.

s/ Marcus M. Crider

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via the Court's electronic filing system:

H. Thomas Parsons
101 W. Main St.
Manchester, TN 37355

Attorney for Plaintiff

on this 28th day of December, 2011.

s/ Marcus M. Crider